

EXHIBIT “E”

**EXHIBIT TO PLAINTIFF'S
MOTION TO COMPEL**

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

VIRGINIA ELIZONDO,)
)
Plaintiff,)
)
VS.) CIVIL ACTION
)
)
SPRING BRANCH INDEPENDENT) NO.: 4:21-CV-01997
SCHOOL DISTRICT, ET AL.,)
)
Defendants.)

ORAL DEPOSITION OF
CHRISTINA GONZALEZ
FEBRUARY 17, 2022

ORAL DEPOSITION OF CHRISTINA GONZALEZ, produced as a witness at the instance of the PLAINTIFF, and duly sworn, was taken in the above-styled and numbered cause on February 17, 2022, from 2:01 p.m. to 3:25 p.m., before Annette Peltier, CSR, Texas Certified Realtime Reporter, in and for the State of Texas, reported by machine shorthand, at the SBISD Athletic Complex, 1050 Dairy Ashford Street, Houston, Texas 77079, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

A P P E A R A N C E S

(All appearing via Zoom videoconference)

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ALSO PRESENT:

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* * No Exhibits * *

CHRISTINA GONZALEZ,

Having been first duly sworn, testified upon her oath as follows:

EXAMINATION

BY MR. ABRAMS:

Q. Good afternoon.

A. Good afternoon.

Q. Simply for the record, will you introduce yourself and tell us your name?

A. Sure.

My name is Christina Gonzalez. I generally go by Chris. It's spelled C-H-R-I-S, G-O-N-Z-A-L-E-Z.

Q. Ms. Gonzalez, my name is Barry Abrams.

We've met before, correct?

A. Correct.

Q. You understand I'm here as a lawyer on behalf of Virginia Elizondo, who has filed a lawsuit against the Spring Branch Independent School District and its trustees in their official capacities only, including, therefore, you.

Do you understand that?

A. Yes, I understand that.

Q. I'm going to call that "the lawsuit" for shorthand today.

If I use that expression, will you know

1 what I'm talking about?

2 A. I will.

3 Q. Let me show you what was earlier marked as
4 Trustee Exhibit 1. It's a copy of the deposition
5 notice for the deposition, and included in the
6 deposition was a request for documents on the very
7 last page, Exhibit A.

8 Did you make an attempt to collect the
9 documents that were requested?

10 A. Yes, sir, we did.

11 Q. And with respect to your personal electronic
12 devices, what, if anything, did you do?

13 A. I handed my devices to the District. So they
14 went through my text messages. They went through my
15 e-mails. I handed my district device, as well, to the
16 District; so they went through my district e-mail.
17 And then I handed them the log-in -- I logged in to my
18 gmail account. There are a few e-mails that come into
19 that -- not many, but enough to make it worth letting
20 them also pull from there, based on the search terms.

21 They saved everything, and then I -- I
22 reviewed and moved them all over.

23 Q. To the best of your knowledge, have you
24 provided to counsel, then, all of the documents that
25 seem to fall within the scope of paragraphs 1 and 2 of

1 the document request?

2 A. Yes, I have.

3 Q. Were there any documents that were deleted or
4 weren't turned over that you think, nevertheless, fall
5 within the scope of the request?

6 A. No, sir.

7 Q. During the deposition, I'm going to refer to
8 the Spring Branch Independent School District as "the
9 district."

10 A. Okay.

11 Q. Is that -- is that all right?

12 A. That's fine.

13 Q. Similarly, I'm going to refer to the
14 Spring Branch Independent School District Board of
15 Trustees as "the board."

16 Is that okay?

17 A. That's excellent.

18 Q. What, if anything, have you done to prepare for
19 your deposition?

20 A. Spoken with my lawyers, and... trying to
21 figure out.

22 Q. Did you review any records or documents in
23 preparation for your deposition?

24 A. Good question.

25 I read through the materials, in particular

1 this one (indicating), but I have not read the expert
2 testimony or any of those pieces.

3 **Q. Have you ever been deposed before?**

4 A. No.

5 **Q. Let's talk about the ground rules, then --**

6 A. Okay.

7 **Q. -- to make sure you understand the process.**

8 I'm sure your lawyers have given you a good
9 explanation --

10 A. Love to hear it again.

11 **Q. -- but I'd like to make sure on the record that**
12 **we're on the same page.**

13 The nice lady who's seated to your left is
14 a court reporter. She's taking down my questions and
15 your answers word for word.

16 **Do you understand that?**

17 A. I do understand that.

18 **Q. Your testimony will be typed up in a booklet,**
19 **often called a transcript. It will look a lot like**
20 **the script of a play.**

21 A. Excellent.

22 **Q. And that testimony can be used in the lawsuit.**

23 **Do you understand that?**

24 A. I do understand that.

25 **Q. Even though we're here in the informal**

1 surroundings of the athletic facility next to Tully
2 stadium, do you understand the testimony you're giving
3 is every bit as solemn and important as it would be if
4 you were giving it in court?

5 A. Yes, I do.

6 Q. It's important that you understand my
7 questions. If I ask you a question you don't
8 understand, will you tell me?

9 A. I will. I'll ask you to repeat the question or
10 clarify the question.

11 Q. Thank you, because I'll be happy to do so.

12 And for that reason, if you've answered one
13 of my questions, may I fairly assume you understood it
14 at the time?

15 A. I think you can.

16 Q. You've been doing a great job so far of
17 answering out loud. It's important that both of us
18 speak with words rather than sounds like "uh-huh" or
19 "uh-uh" or --

20 A. Or head nods?

21 Q. -- or -- or gestures or nods of the head
22 because that's not what our court reporter takes down,
23 and I'm always enjoying to see how they take the
24 "uh-huh" or "uh-uh" down when I say we can't do that.
25 It's part of my perverse sense of humor.

1 It's important that we speak one at a time
2 because, again, our court reporter can only do her job
3 well and painlessly if we wait until the other has
4 stopped talking.

5 If you'll give me the opportunity to get my
6 question out before you start answering, I promise I
7 will give you the opportunity to finish your answer.

8 A. Sounds like a good deal.

9 Q. If I ever inadvertently start talking before
10 you're finished, let me know, and I'll let you finish
11 and complete your answer, okay?

12 A. I can agree to that.

13 Q. We're not going to be here a long time. We'll
14 probably take one break.

15 But if you need a break before we otherwise
16 call for a break, just tell me, and I'll be happy to
17 stop. Okay?

18 A. Will do.

19 Q. Have you ever been a party to a lawsuit,
20 meaning have you ever sued somebody or been sued?

21 A. I don't believe so.

22 Q. Have you obtained any professional licenses or
23 certifications?

24 A. Not specifically. Graduate school, not a
25 license or certificate, digital marketing kind of

1 thing, nothing -- nothing...

2 **Q. Have you ever been charged and convicted of any**
3 **criminal offense, excluding any kind of traffic**
4 **offenses?**

5 A. No.

6 **Q. Where were you born and raised?**

7 A. I was born in Frankfurt, Germany. I was raised
8 internationally and in Texas and in California. I
9 grew up in the oil industry.

10 My dad, for the record, does not like
11 Houston; so he would live anywhere but Houston.

12 **Q. Okay.**

13 A. But I came to Houston after college.

14 **Q. Where did you graduate from high school?**

15 A. Bakersfield High School in Bakersfield,
16 California.

17 **Q. After graduating from high school, what did you**
18 **do next?**

19 A. Sure.

20 I attended Baylor University, four years
21 there, and then a job in The Woodlands brought me to
22 the Houston area.

23 **Q. When did you graduate from Baylor?**

24 **I have a lot of Baylor Bears in my family.**

25 A. Of course.

1 1998. That's right, yeah, '98.

2 Q. My recollection, from looking at some
3 background information, is you had multiple degrees.

4 What are your various degrees?

5 A. Sure.

6 So I have a Bachelor of Arts in business
7 and one in German from Baylor, and then I have an MBA
8 from Rice University.

9 Q. When did you obtain your MBA from Rice?

10 A. 2005.

11 Q. If you would, tell me about your -- when did
12 you come back to Houston? Or you said The Woodlands?

13 A. So it was in The Woodlands for -- I did some
14 work in business consulting with 401(k) plans.

15 Then I became a teacher here in the Houston
16 area, and then graduate school. Spent one year in New
17 Hampshire, but found our way back to Houston to raise
18 our family.

19 Q. And when -- what year was that?

20 A. So the year after Rice, 2005. That summer
21 until the summer of 2006 I was up in New Hampshire.

22 Q. So you returned to Houston in '6?

23 A. Yes.

24 Q. Is that what you're telling me?

25 A. I did.

1 **Q. And where did you move when you came back to --**

2 A. Sure.

3 **Q. -- town --**

4 A. When we came back to Houston, we lived in
5 Lindale Park there on the north side for, I think, two
6 years. Then we found the home in Spring Branch.

7 I did not realize that the day we signed
8 our papers, I found out I was pregnant with my second
9 child, and so it worked out perfectly because we went
10 from this very small home built, I think, in, like,
11 1903, to this -- you know, what we thought was a big
12 house at the time --

13 **Q. And what --**

14 A. -- in Spring Branch.

15 **Q. -- year would that have been, again?**

16 A. So we went there in 2008. We would have moved
17 here in April of 2008.

18 **Q. Your surname, Gonzalez, sounds Hispanic.**

19 **Are you Hispanic?**

20 A. I am not Hispanic.

21 **Q. Is your husband?**

22 A. My husband is.

23 **Q. And you've indicated you have two children.**

24 **What are their names and ages?**

25 A. So I actually have four children now.

1 **Q. Ahh, I'm sorry.**

2 A. That's okay.

3 My oldest is 15, Savannah; and then Jacob
4 is 13. See if I can get these all right. Sebastian
5 is 10, and Lucas is 7.

6 **Q. Where have your children gone to school?**

7 A. Sure.

8 So they all went to Pine Shadows
9 Elementary, which is our neighborhood school. Two of
10 them are there currently. Two of them attended KIPP
11 Courage at Landrum Middle School for middle school.
12 One is still there.

13 And then, Savannah transferred herself to
14 Stratford for high school, so she's a freshman next
15 door.

16 **Q. If you would, describe your employment history
17 after you hit the -- hit The Woodlands.**

18 A. Yeah. So I became a teacher. I taught at YES
19 Prep.

20 Back then, YES Prep was one school, so we
21 were in the east end -- actually, in portables on a
22 parking lot -- history teacher. Taught for a couple
23 of years.

24 I thought, wow, this is just this
25 incredible experience, but I'm not meant to be -- you

1 know, how am I going to become this great teacher? I
2 didn't know how to do that.

3 So I went back to -- what do people do?
4 They go to business school.

5 When I did business school, I thought, oh,
6 I'm done with that. I'll go work in the oil and
7 gas industry.

8 Spent, I think, four months there and
9 realized I just -- there was no -- I couldn't find any
10 energy in the space, right? I mean, people who know
11 me know I'm an educator at heart. I do better when
12 I'm teaching and when I'm talking about opportunities
13 for kids.

14 So I went back into school systems and
15 worked at KIPP for nearly a decade, and then I've
16 worked at some other nonprofits.

17 I now currently have a marketing and
18 communications company with a business partner who's
19 based in New York, and we work with public school
20 systems and nonprofits, but mostly public schools.

21 **Q. What services do you provide your clients?**

22 A. Yeah.

23 So it's marketing communications, so it's
24 everything from PR -- a little bit of earned media,
25 but mostly, like, communications with letters, things

1 like that, marketing strategy, digital marketing,
2 everything online, right? Google, Facebook ads,
3 things like that to reach talent and to reach
4 families.

5 And then -- yeah. I mean, most of the
6 outward-facing communications work.

7 **Q. How did you find your way onto the school board
8 for the first time?**

9 A. Sure.

10 So I was appointed in 2010, and it was to
11 fill Mary Grace Landrum's seat. That happened in
12 September of 2010.

13 Those of us who can think back that far --
14 I actually remember, if you time it with my kids, I
15 was pregnant at the time. I had a baby in December,
16 and then in February I filed to run to hold that seat.
17 Someone filed to run against me, so it was an active
18 campaign.

19 And then I was lucky with a lot of
20 community support to win in May.

21 **Q. Who was the -- who was your opponent in your
22 first campaign?**

23 A. Sure.

24 Kelly Tronzo.

25 **Q. Do you recall any issues in particular that**

1 **were significant in that campaign?**

2 A. I do.

3 Kelly spent a lot of time talking about the
4 bond and whether it was being managed or mismanaged.
5 It was being managed well, but she, like -- she told
6 people it was not being managed well.

7 She told people that we were going to take
8 away the homestead exemption and pushed really hard on
9 that, which had never been discussed and, again, is
10 not something that Spring Branch is looking to do, and
11 just, you know, spent a lot of time creating stories.

12 But as others will remember, you know, the
13 community really rallied around the truth, and that's
14 what prevailed, is what I believe, because people will
15 also remember I had not lived in the district for a
16 long time; so I was not a well-known person. I just
17 was, you know, a hard-working, former teacher, was the
18 story I kept telling, with three kids at the time.

19 **Q. Since that time, which was in 2000 and --**

20 A. Yeah.

21 So I was appointed 2010 --

22 **Q. Then you ran in '12?**

23 A. -- and I ran in 2011.

24 **Q. Oh, '11?**

25 A. Yes.

1 **Q. Since that time, have you had a contested**
2 **election?**

3 A. Yes.

4 **Q. When was your next contested election?**

5 A. Let's make sure I get this right. I believe it
6 was Mary Curry Mettenbrink who ran against me because
7 she wanted -- she wanted to serve and she, too -- you
8 know, she was a nonprofit leader.

9 She didn't actively run. She didn't buy
10 yard signs or do a lot of the things that people do.
11 She just wanted to put her name -- she said, I want to
12 put my name in the hat.

13 I said, okay. Let's -- let's do that.

14 Yeah.

15 **Q. Do you recall whether there were any issues in**
16 **particular during the 2017 campaign with**
17 **Ms. Mettenbrink?**

18 A. No. We had community for -- a community forum
19 and, you know, people asked questions and we answered
20 them based on our experience and our perspective and
21 we had an election.

22 **Q. Then your term would have been up in 2020.**

23 Did you have an opponent in 2020? I think
24 it was 2020.

25 A. No, you know, that's the right math. I'm

1 trying to think.

2 So the original filing period, when it
3 opened, there were -- there was someone who chose to
4 run against me. The election was delayed due to
5 COVID. And then that summer, during the appropriate
6 time period, before the appropriate deadline, she --
7 she removed her name, whatever the official phrase is
8 for how you do that.

9 **Q. In 2020, then the board had called an**
10 **election --**

11 A. Uh-huh.

12 **Q. -- for trustee for May of 2020?**

13 A. Yes, for both -- there were two people running,
14 one against myself and one against Josef Klam.

15 **Q. How did it come about that the May 2020**
16 **election was delayed?**

17 A. It was delayed by govern -- I believe, by the
18 governor's order, I believe.

19 **Q. When did that election occur?**

20 A. In November of 2020, though, as a reminder,
21 both of those names actually -- both people withdrew
22 their names, so the election was cancelled.

23 **Q. Do you recall offhand whether the election that**
24 **was originally scheduled in May of 2020 was, again,**
25 **called for November and then cancelled thereafter**

1 because the candidates opposing both you and Reverend
2 Klam withdrew?

3 A. I believe that is accurate.

4 Q. Do you recall there being any public outcry in
5 the spring of 2020 when the May 2020 election was
6 deferred to November 2020?

7 A. I did not hear anything from the community at
8 the time.

9 Q. Did you consider that the community was
10 disserved in some way by the fact that the May 2020
11 trustee election was deferred until November 2020?

12 A. No, I did not.

13 Q. Were there complaints that the public in Spring
14 Branch was being disenfranchised because they had to
15 wait until November to cast their ballot?

16 A. I don't recall that there were any.

17 Q. Are you a member of any organized church
18 congregation?

19 A. No.

20 I joined Hope City once, but I haven't been
21 back in a couple of years.

22 Q. This is not -- this is not a religious purity
23 test.

24 A. I was going to say, am I going to lie?

25 But I joined Hope City probably 2018, 2019,

1 somewhere in there, and then I haven't been back in a
2 couple of years.

3 **Q. As lawyers, we're always interested in**
4 **relationships in the community; and that happens to be**
5 **one potential community relationship.**

6 A. Of course.

7 Q. I have no interest in the dogma that one
8 doesn't or does adhere to, I promise you.

9 **Before you were elected to the board, had**
10 **you ever served on any district advisory or citizens'**
11 **committees?**

12 A. Yes, I had served on one. I think we called it
13 the Five Year Visioning Committee, and that was the
14 community task force. I think it had included -- I --
15 my estimate, probably about 80 people from around the
16 community, different backgrounds and perspective to
17 establish, kind of, a five-year plan.

18 Dr. Duncan Klussmann was superintendent at
19 the time. The major outcome of that was the
20 commitment of T24 as our goal.

21 **Q. Are you a member of any community or civic**
22 **organizations?**

23 A. Spring Shadows Moms' Club, which is funny. And
24 then, you know, my kids are in the Cub Scouts. I'm
25 trying to think of the other things, but they're

1 usually related to the kids. FFA, related to the
2 kids. I mean, these are things related to the
3 activities my kids do. I think those are the current
4 ones.

5 I was a Girl Scout leader once, which is
6 funny.

7 **Q. Have you ever participated as a member of the**
8 **Spring Branch Education Foundation?**

9 A. Oh, thank you, yes, I am on the Spring -- so --
10 and I do serve on a few boards, so let me cover that
11 for you.

12 So I'm on the Spring Branch Education
13 Foundation Board. I'm also on the SPARK Park board,
14 and then, of course, the school board. I think those
15 are the three, yes.

16 **Q. Have you ever held any position with one of the**
17 **school PTAs?**

18 A. No, I have not.

19 **Q. Have you ever been elected or appointed to any**
20 **position with a political party?**

21 A. No.

22 **Q. If you would, tell me a little bit about your**
23 **experience with KIPP.**

24 **What were you doing?**

25 A. Sure.

1 So I started working at KIPP in Houston in
2 2000 -- wait, let me rephrase -- in Houston in 2007.
3 I actually worked for KIPP up in Boston in 2005, so
4 that one year when I was living in New Hampshire
5 because, as you guys know, in the -- New England you
6 can live in one state and work in another state.

7 But I came back to Houston in '06 -- make
8 sure I'm saying this all right -- and then was
9 Development Director for quite a few years and founded
10 their marketing department, yeah. But I think I
11 worked there for a total of 10 or 11 years.

12 **Q. What attracted you to KIPP?**

13 A. The same thing that attracted me to YES Prep,
14 which is my heart is about educational opportunity for
15 kids.

16 As many people who talked to me about that
17 know, I, growing up internationally, lived in places
18 where that did not exist, purely based on the country,
19 right? So Nigeria, in particular.

20 And when I came to the United States --
21 back to the United States to live here and then
22 eventually become an educator, I thought, oh, it's all
23 about the education. That's going to open all the
24 doors, and that's going to be the equalizer.

25 And I do believe in my heart that that's

1 still the truth, that the education is the foundation
2 for equalization and opportunity, but I came to
3 realize that there was a difference of opportunity
4 frequently based on, you know, the socioeconomic of a
5 family because I will always say that, technically,
6 kids don't have jobs, they're not the ones with money,
7 but I do recognize that families support kids with the
8 money they have.

9 **Q. Am I correct that five of your colleagues on**
10 **the board live on the south side of Interstate 10?**

11 A. Yes, that is accurate.

12 **Q. And am I correct that six of the seven members**
13 **of the board that you're currently president of have**
14 **children who are zoned to south side schools?**

15 A. South side high schools, yes.

16 **Q. South side high schools?**

17 A. Yes.

18 **Q. You're zoned in your residence --**

19 A. Uh-huh.

20 **Q. -- to several north side schools, correct?**

21 A. Correct.

22 **Q. Based on your experience as a resident, as well**
23 **as on the school board --**

24 A. Uh-huh.

25 **Q. -- can you tell us whether there are, in your**

1 **mind, socioeconomic differences, as a generalization,**
2 **between the students and residents on the north and**
3 **south sides of I-10?**

4 A. Yes. I'm not an expert, but yes.

5 **Q. Just as a -- as a concerned and active**
6 **resident, how would you describe the differences?**

7 A. As a concerned resident, I love my community
8 and my neighborhood. It is multicultural, as much as
9 Spring Branch is, but it is the old and original
10 Korean area of Spring Branch.

11 There's many Hispanic families. It is a --
12 it's a background like that of my family.

13 My husband did not grow up -- I grew up
14 middle income because my dad would -- had the
15 opportunity to go to college. My husband did not.

16 It mirrors the reality of so much of
17 Houston, which is there are those with educational
18 experiences that led to degrees and opportunities, and
19 then there are hard -- incredibly, also -- incredibly
20 hard-working people who are making their own
21 opportunities but don't have the support of an
22 education to do so.

23 **Q. What career path has your husband followed?**

24 A. Sure.

25 My husband is an entrepreneur, he owns two

1 businesses. He owns a uniform rental company and then
2 batting cages.

3 **Q. During the period of time you have been in**
4 **Houston and in Spring Branch, have you observed**
5 **whether or not the demographics of the district have**
6 **changed, or have they been more or less constant while**
7 **you've been here?**

8 A. I think two things are happening in my
9 neighborhood. In particular, the -- when I moved in,
10 there were no other children on the street. Many of
11 the homes were owned by elderly people who have moved
12 or passed away but have sold those homes.

13 Home values have increased on my street
14 to about triple of what I paid for it -- doing the
15 math right now -- 14 years ago.

16 And I think we are seeing a little bit of a
17 shift and a general movement of people -- I mean, home
18 values went up. We're seeing some form of a
19 gentrification happening in our Spring Branch.

20 **Q. Uh-huh.**

21 **Let me hand you what was earlier marked as**
22 **Exhibit 8.**

23 A. Sure.

24 **Q. It's the Board Operating Procedures manual. I**
25 **trust you're very familiar with this?**

1 A. I am.

2 Q. If you would, please turn to Page 6 that deals
3 with board member ethics.

4 A. Yes.

5 Q. Page 6 recites, among other things, that board
6 members are to promote the best interests of the
7 district and adhere to various ethical standards,
8 including, among other things, consistently upholding
9 all applicable laws.

10 A. Right.

11 Q. Do you agree that one of the applicable laws
12 that the board is charged with the duty to uphold is
13 the Voting Rights Act?

14 A. I -- yes.

15 Q. Another --

16 A. Wait a minute.

17 I can't imagine a world where we don't
18 uphold federal and state and local laws and
19 ordinances.

20 Q. Do you agree that you and your colleagues are
21 obliged to uphold all the applicable laws, federal
22 state, and local, whether or not you might agree with
23 them?

24 A. Yes.

25 Q. Another of the ethical obligations under the

1 **Integrity of Character subdivision is that board**
2 **members are not to disclose any information that is**
3 **confidential by law.**

4 **Do you see that?**

5 A. I do. That is true.

6 **Q. If you would, tell the judge, what's an**
7 **executive session of the board?**

8 A. Sure.

9 The executive session outlined by law
10 allows the board to convene in a more private setting
11 to discuss matters that are allowed by law, only those
12 matters, frequently about personnel, stuff that should
13 not be aired publicly, right? Those are important
14 discussions. And then, conversations with attorneys,
15 legal matters -- I think it's all other matters, legal
16 matters, as allowed by law.

17 **Q. What's your understanding of the**
18 **confidentiality obligations that you and your**
19 **colleagues have concerning discussions that take place**
20 **in the executive session?**

21 A. It is an extremely confidential space; and at
22 times, as board president, I would -- will remind
23 people: Remember, this was said in executive session,
24 so this is not something that we can -- we can
25 remember or mention to the community.

1 **Q. During an executive session, have you ever**
2 **observed any of your colleagues communicating with**
3 **someone outside the session via phone, text, or e-mail**
4 **in which they appeared to be disclosing anything that**
5 **was then under discussion in executive session?**

6 A. I have -- I have never seen anyone where I
7 thought they were disclosing something that was
8 happening within executive session.

9 I know that there have been moments when
10 one of us might tell our kids where to find the food,
11 things like that.

12 **Q. Outside of an executive session --**

13 A. Uh-huh.

14 **Q. -- have you ever become aware of any of your**
15 **colleagues having communicated something to a third**
16 **party that had earlier been discussed in an executive**
17 **session?**

18 A. I have never had evidence of that. I have
19 heard -- heard complaints or concerns.

20 **Q. If you would, tell me about the complaints or**
21 **concerns that you have received, if any, that might**
22 **concern the lawsuit. That's all I'm really interested**
23 **in, not any other potential --**

24 A. Right.

25 **Q. -- violations of the confidentiality of the**

1 **executive session.**

2 A. There -- there is one instance that a couple of
3 board members, two, approached me, as board president,
4 saying, I am concerned that the -- that we discuss
5 this.

6 And we very quickly, thereafter, received
7 e-mails from the community as if they knew it faster
8 than anyone else.

9 Q. Do you recall what that subject was that you
10 had heard was already -- that you know was already
11 being discussed in the community? So I'm not now
12 asking you to divulge the executive session content,
13 but what was reported to you that the community was
14 then discussing that happened to have been earlier the
15 subject of an executive session?

16 A. So it was a discussion about the -- what we
17 call the pending litigation, frequently, and this
18 lawsuit. And it was about a discussion about what our
19 next legal steps were and what was the right next
20 step.

21 Q. Do you recall, as a member of the board,
22 receiving multiple communications from certain members
23 of the public exhorting the board not to entertain any
24 discussions amicably to resolve the lawsuit?

25 A. Yes.

1 Q. And did those public communications exhorting
2 the board not to engage in discussions about an
3 amicable resolution of the lawsuit occur essentially
4 immediately after an executive session?

5 A. The next morning, I believe so.

6 I -- I would let people look at the
7 evidence of the date and time stamps on the e-mails,
8 but I believe so.

9 Q. Are you aware that the District's lawyers
10 executed an agreement with the plaintiff to have
11 conversations about whether or not an amicable
12 resolution of the lawsuit could occur?

13 A. I believe so.

14 Q. Are you aware that the District reneged on that
15 agreement?

16 A. Yes.

17 Can I close this one?

18 Q. That's fine. I think we're going to be through
19 with -- with that one.

20 A. My favorite document in reference to the board
21 operating procedures.

22 Q. I'm in awe of those of you who can absorb that
23 information.

24 A. We've worked with it for a while, right?

25 Q. Let me hand you what's earlier been marked as

1 **Trustee Exhibit 9.**

2 A. Okay.

3 **Q. It's a copy of the application for preliminary**
4 **injunction in the lawsuit without the voluminous**
5 **exhibits.**

6 A. Okay.

7 **Q. Have you ever seen that before?**

8 A. I know I've -- I have access it to. I have not
9 read it.

10 **Q. Attached to that document were, among other**
11 **things, expert reports, the expert report of**
12 **Dr. Robert Stein --**

13 A. Okay.

14 **Q. -- which has been marked as Exhibit 10, and the**
15 **expert report of Dr. Andres Tijerina, which has been**
16 **marked as Exhibit 11.**

17 A. Okay.

18 **Q. Have you ever seen Dr. Stein or Dr. Tijerina's**
19 **reports?**

20 A. We do have the access to these.

21 **Q. Have you ever reviewed either of those reports?**

22 A. I have not read them closely. I have not read
23 them.

24 **Q. Why not?**

25 A. Because I am committed to following the outcome

1 of the lawsuit, and it is in the hands of a judge.

2 Q. From your answer, do I understand that you had
3 no interest in seeing what these experts might have to
4 say about issues in the lawsuit affecting the school
5 district?

6 A. No, I would not say that.

7 Q. Then -- then why have you elected not to read
8 those reports?

9 A. You'd have to remind me as to when they showed
10 up in my inbox.

11 Q. That I can't tell you.

12 A. Right.

13 Q. I can tell you when it was filed. I can't tell
14 you when it wound up in your inbox.

15 A. January 20th, 2022, as far as when it was
16 filed.

17 Q. No. In fairness, the reports were attached to
18 a lawsuit paper filed on February the 1st.

19 A. Yeah.

20 I would -- I would actually put it down to
21 a limit of time, not a commitment to understanding the
22 context, but I also fundamentally believe that this is
23 in the hands of a judge and we're going to have to
24 follow that.

25 Q. Are you generally familiar at all with

1 **Dr. Stein and his background --**

2 A. I know --

3 **Q. -- since you went to Rice?**

4 A. He's not in the business school, but I am
5 familiar with his name.

6 **Q. Are you aware that in the past, Dr. Stein has
7 been an expert for the district?**

8 A. That sounds accurate.

9 **Q. He's done survey work in the past that you're
10 familiar with in connection with bond elections,
11 right?**

12 A. Correct.

13 **Q. Do you have any reason to dispute Dr. Stein's
14 qualifications to render the opinions that he has as a
15 social scientist?**

16 A. I would not know, as far as -- when it comes to
17 this work, his experience and strength -- skills, but
18 you're right, he has done demographic work for the
19 district in the past.

20 **Q. My question's a little different. And just so
21 you'll know, part of this process is to figure out
22 what witnesses can and can't and will and won't say at
23 a later proceeding.**

24 A. Uh-huh.

25 **Q. So one of the things we, as lawyers, do is try**

1 to figure out whether a witness has anything to say
2 about a subject.

3 A. I don't have anything to say about Dr. Stein.

4 Q. So my question is: Do you claim to have some
5 ability to criticize or dispute the qualifications of
6 Dr. Stein?

7 A. I do not have any knowledge of -- reason to
8 dispute his qualifications.

9 Q. Similarly, Dr. Tijerina has issued a report
10 dealing with different subjects.

11 Do you have the ability or do you claim the
12 expertise to dispute the qualifications of
13 Dr. Tijerina to render the opinions he has about the
14 subjects in his report?

15 A. I do not.

16 Q. If you would, please, turn to Exhibit 10.
17 That's Dr. Stein's report. And if you would, turn to
18 Page 3.

19 A. Okay.

20 Q. There's a section in Dr. Stein's report labeled
21 Summary of Opinions.

22 A. Uh-huh.

23 Q. Do you see that?

24 A. Yes.

25 Q. Dr. Stein has opined that there is

1 statistically significant -- significant evidence of
2 racially-polarized voting in the Spring Branch School
3 District Board elections for the period of 2015 to
4 2021.

5 That's his opinion? Do you see that?

6 A. I do see that.

7 Q. Do you agree, disagree, or have no opinion
8 about whether or not that's true?

9 A. I have no opinion.

10 Q. Setting aside the statistical aspect of it --

11 A. Uh-huh.

12 Q. -- from your experience, have you -- have you
13 formed an opinion about whether voting in
14 Spring Branch has ever been racially polarized?

15 A. No, I have not.

16 Q. And by the term "racially polarized," I mean
17 that members of one race or ethnicity more often than
18 not tend to support different candidates than members
19 of another race or ethnicity?

20 A. I do not have an opinion about that.

21 Q. Let me hand you what was earlier marked as
22 SBISD Exhibit Number 5.

23 A. Okay.

24 Q. Do you recognize that as a map of the middle
25 school enrollment zones in Spring Branch? And since

1 those are the zones used for elections, they're also
2 the election precincts.

3 A. Yes.

4 Q. Do you agree with me that four of the middle
5 school enrollment zones and, therefore, four of the
6 election precincts, lie totally north of Interstate
7 10? That would be --

8 A. I do agree. Spring Oaks Middle and Northbrook
9 Middle.

10 Q. Spring Woods --

11 A. Spring Woods Middle and Landrum Middle.

12 Q. Right.

13 And three of the middle school enrollment
14 zones in election precincts lie primarily on the south
15 side, although both Spring Branch and Spring Forest
16 have portions that lie north of 10, correct?

17 A. Correct.

18 Q. Do you know anything or have an opinion about
19 whether the demographics of the neighborhoods north of
20 I-10 in the Spring Branch Middle zone, whether they
21 are largely Anglo or not?

22 A. I don't have an opinion or demographic data on
23 that.

24 Q. The area north of I-10 in the Spring Branch
25 Middle School zone and election precinct is made up,

1 among other things, of Spring Valley Village and
2 Hillshire Village.

3 With that as background, does that cause
4 you to have any additional opinion about what the
5 racial or ethnic makeup of that portion of the middle
6 school zone is?

7 A. What I will recognize within that zone is that
8 includes Valley Oaks Elementary, as you pointed to;
9 and I do not have the current insights on what Valley
10 Oaks' demographics are. Once upon a time they were
11 very -- half Anglo, half Hispanic.

12 My understanding of what we've seen's
13 changed in all of our neighbors, is a shift to more
14 Anglo.

15 Q. Similarly, with regard to the Spring Forest
16 Middle School enrollment zone and election precinct,
17 do you, as you sit here today, have an opinion about
18 what the general demographics are of the area north of
19 Interstate 10?

20 A. That is a very shifting demographic, as well,
21 with -- there's a lot of new construction, you know,
22 multiple condos on single lots, things like that.

23 So you're seeing -- I mean, I would say a
24 real estate expert would probably say that you're
25 seeing more wealth move into that area or people with

1 more income.

2 Q. Has -- to use your phrase, gentrification has
3 begun to occur north of I-10, has that generally been
4 accompanied by larger Anglo populations?

5 A. My perception is yes. I do not have the data
6 to support that.

7 Q. Do you agree that five of the seven trustees
8 are zoned to high schools south of I-10?

9 A. I do agree.

10 Q. And five of the seven trustees have children
11 zoned to one high school, Memorial, right?

12 A. Correct.

13 Q. Six of the seven trustees have children zoned
14 to Memorial or Stratford; is that correct?

15 A. Correct.

16 Let's also recognize that some of them have
17 adult children who are no longer zoned, but their
18 households live in those zones.

19 Q. Thank you, thank you. I'm really -- and I
20 appreciate the clarification. I'm really focusing on
21 the enroll zone in which they reside, so thank you for
22 clarifying that.

23 And the fact is, you're the only trustee on
24 the school board that lives in an enrollment zone that
25 provides for attendance to the north side schools,

1 **correct?**

2 A. Correct, and I reside in one neighborhood for
3 one of the two high schools, not both.

4 **Q. And which high school are your children zoned**
5 **to?**

6 A. Spring Woods High School.

7 **Q. Let me hand you what was earlier marked as**
8 **Exhibit 13.**

9 A. Right.

10 **Q. Exhibit 13 is a photograph of the current**
11 **board, and superimposed on it is the demographic**
12 **information extracted from the District's website for**
13 **its student body.**

14 **Do you recognize both your colleagues and**
15 **the demographic data for your student body in**
16 **Spring Branch?**

17 A. I do.

18 **Q. And can you confirm for our record that all of**
19 **the members of the board currently are white?**

20 A. Yes.

21 **Q. And can you confirm that the student population**
22 **in the district is not majority white?**

23 A. I can.

24 **Q. In fact, according to the District's last set**
25 **of data, 59 percent of the children in its schools are**

1 Hispanic, correct?

2 A. That sounds accurate, yes.

3 Q. Do you agree or disagree with the proposition
4 that voters and parents in the district should have
5 the opportunity to elect someone who lives in their
6 area, knows their schools, knows their neighborhood,
7 and shares their experiences?

8 MR. HENRY: Objection, form.

9 You can answer.

10 A. I don't have a -- a strong opinion -- can you
11 repeat the question?

12 Q. (BY MR. ABRAMS) Do you agree or disagree with
13 the proposition that voters and parents in the
14 district should have the opportunity to elect someone
15 who lives in their area, knows their schools, knows
16 their neighborhood, and shares their life experiences?

17 MR. HENRY: Objection, form.

18 You can answer.

19 A. I agree that people should have the option to
20 elect people that understand their experience.

21 Q. (BY MR. ABRAMS) Do you believe that you or
22 your other colleagues on the board are better
23 qualified to make decisions about what is best for the
24 children who attend the north side schools than other
25 parents whose children attend those schools?

MR. HENRY: Objection, form.

You can answer.

A. I believe that parents should be the ones making many of the decisions for their child's education and that they should have an integral voice, but I do not believe that my colleagues do or do not have those perspectives in mind when making decisions.

Q. (BY MR. ABRAMS) In your mind, is it desirable for parents of children in each middle school or high school enrollment zone to have representation on the board?

MR. HENRY: Objection, form.

You can answer.

A. I don't have an opinion about that.

Q. (BY MR. ABRAMS) In your mind, is geographic representation of the stakeholders in the district a factor that you think would be relevant to the composition of the board?

A. I do.

Q. According to Dr. Stein's report, white non-Hispanics vote sufficiently as a block to enable them, in the absence of special circumstances, like single-member districts, to defeat minority voters' preferred candidates of choice. That's one of his opinions, and it's found on Page 3 of Exhibit 9 -- or

1 **10, actually.**

2 A. Yes.

3 **Q. Do you agree, disagree, or have no opinion**
4 **about that conclusion that Dr. Stein has made?**

5 A. Since I turned the page, can you repeat the
6 question?

7 **Q. Yes, ma'am.**

8 A. Oh, is it this one right here, the third bullet
9 (indicating)?

10 **Q. Let me -- let me open --**

11 A. It says, (as read) Sufficiently constitute a
12 majority of the voting age --

13 **Q. Yeah.**

14 A. -- this is as a block --

15 **Q. Hang on. Let me get with you.**

16 A. I have no opinion. It's hard to...

17 **Q. Do you know one way or the other whether or**
18 **not, as Dr. Stein opined in his second bullet point on**
19 **Page 3, white non-Hispanics vote sufficiently as a**
20 **block to enable them to override minority voters'**
21 **preferred choices?**

22 A. I do not know.

23 **Q. Dr. Stein's next summary opinion is that, (as**
24 **read) Geographic concentration of Hispanics in the**
25 **district is sufficient to constitute a majority of the**

1 voting age population in at least one single-member
2 district, if there were seven districts.

3 Do you have an opinion about whether that's
4 right, wrong, or no opinion?

5 A. I have no opinion.

6 Q. Dr. Stein also has expressed the opinion that
7 there's strong evidence in the scholarly literature
8 that single-member district forms of representation
9 enhance proportional representation of minority
10 candidates on legislative bodies.

11 Do you agree, disagree, or have no opinion
12 about whether that's right or wrong?

13 A. I have no opinion.

14 Q. Dr. Stein is of the opinion that there's strong
15 evidence in the scholarly literature to conclude that
16 single-member district representation increases the
17 likelihood that minority -- minority candidates will
18 contest, meaning run --

19 A. Uh-huh.

20 Q. -- for positions --

21 A. Okay.

22 Q. -- on legislative bodies.

23 Do you agree, disagree, or have no opinion
24 about that?

25 A. I have no opinion.

1 Q. Dr. Stein has expressed the opinion that
2 there's strong evidence in the scholarly literature to
3 conclude that single-member district representation
4 will produce policies that are more responsive to the
5 preferences of minority voters.

6 Do you agree, disagree, or have no opinion
7 about his conclusion?

8 A. I have no opinion about it.

9 Q. And then finally, Dr. Stein offers the
10 concluding opinion that, in his judgment, the district
11 should adopt a single-member plan for the election of
12 its trustees.

13 Do you agree, disagree, or have no opinion
14 about his view?

15 A. I have no opinion.

16 Q. Do you contend that an
17 economically-disadvantaged, Spanish-speaking parent
18 who lives on the north side of I-10 is less qualified
19 to represent the interests of Spring Branch residents
20 and students than you and your colleagues?

21 MR. HENRY: Objection, form.

22 You can answer.

23 A. No.

24 Let me make sure -- can you rephrase the
25 questions so that I answered [sic] yes or no

1 correctly?

2 I do not contend that they cannot.

3 Q. (BY MR. ABRAMS) At this point, there certainly
4 are no economically-disadvantaged Spanish-speaking
5 parents from the north side of I-10 on the school
6 board, right?

7 A. Correct.

8 Q. Although you have a Hispanic surname, you're
9 neither economically disadvantaged --

10 A. No, I'm not.

11 Q. -- nor -- nor are you Hispanic, correct?

12 A. No, I'm not.

13 Q. Is that correct?

14 A. That is correct. I am not economically
15 disadvantaged nor am I Hispanic.

16 Q. If you would, let's look at Dr. Tijerina's
17 report, which is Exhibit 11, and if you would, turn to
18 Page 43, please.

19 A. Sure.

20 Q. On Page 43 of Dr. Tijerina's report, in the
21 very last sentence he has a concluding statement in
22 which he states, quote, As a result of the historical
23 discrimination against Latinos in Texas, Latinos in
24 Spring Branch and Houston, Texas, still bear the
25 effects of this discrimination which hinders their

1 ability to participate effectively in the political
2 process, close quote.

3 Do you agree, disagree, or have no opinion
4 about Dr. Tijerina's conclusion?

5 A. I have no opinion about his conclusion.

6 Q. Recognizing that you have a marital privilege
7 that you're free to assert, have you ever talked to
8 your husband about whether or not he has an opinion
9 about whether Latinos in our community have or have
10 not been the subject of ethnic discrimination?

11 MR. HENRY: Objection, form.

12 But you can answer.

13 A. We have not.

14 Q. (BY MR. ABRAMS) Page 9 of the Application for
15 Preliminary Injunction, which is Exhibit 9, contains
16 three legal factors that the lawyers will be
17 discussing with the judge. And I know you're not a
18 lawyer, but I need --

19 A. I am not a lawyer.

20 Q. -- but I want to ask you a few questions about
21 these factors.

22 The first factor that will be discussed
23 with the judge is whether or not in Spring Branch
24 there is a minority group that is sufficiently large
25 and geographically compact to constitute a majority in

1 a single-member district.

2 Do you have a view about whether or not
3 that's true?

4 A. I have a view that there are neighborhoods in a
5 community that are predominantly Hispanic, covering
6 many Latin-American countries, but I do not know
7 whether that is large enough of a group to create a
8 single-member district.

9 Q. The second factor that will be discussed with
10 the judge is whether or not there is a minority group
11 that is politically cohesive and votes as a block.

12 Do you have a view about whether or not
13 that's true?

14 A. I don't know.

15 Q. I take it you don't have a factual basis to
16 take exception with whatever Dr. Stein's conclusions
17 may be, correct?

18 A. I do not.

19 Q. Is that correct?

20 A. That is correct.

21 Q. And then the third factor that will be
22 discussed in the legal proceedings is whether in
23 Spring Branch the white majority votes sufficiently as
24 a block to enable it, absent special circumstances, to
25 defeat or override the minority -- minorities'

1 preferred candidate.

2 Do you have a view about whether or not
3 that's true?

4 A. I do not, because that would presume that
5 number two existed.

6 Q. As I asked you earlier, do you have any factual
7 basis to controvert Dr. Stein's conclusions about that
8 subject?

9 A. I do not.

10 Q. Speaking personally, are you opposed to
11 changing in some way the current system that the
12 district uses to elect its trustees?

13 A. I will follow the law. I will follow what
14 is -- what the outcome of the Voting Rights Act
15 litigation is, and I -- I believe with all of my
16 beliefs that the current at-large system works in a
17 way that people are invested and cognizant of the
18 nuance and the needs of our community.

19 I do recognize that we only know the shoes
20 we live in and that it takes extra work and
21 intentionality to understand others' experiences.

22 And I've said that so many places that it
23 would be real easy to have heard me say it.

24 **MR. HENRY:** I hate to stop us, because
25 I think we're on a good roll, but would you mind

1 taking a break at this point?

4 (Break taken from 2:52 p.m. to
5 2:59 p.m.)

6 Q. (BY MR. ABRAMS) I understood from your most
7 recent answer, or a recent answer, that you desire to
8 follow whatever the judge determines the law to be.

9 A. Correct.

10 Q. Do you personally have any opposition to the
11 district changing its method of electing its trustees?

12 A. I do not have personal opposition and will
13 follow the judge's declaration or decision.

14 Q. Are you personally opposed to geographic
15 representation on the school board for parents from
16 each of the various areas, or stakeholders from each
17 of the various areas from within the district
18 geographically?

19 MR. HENRY: Objection, form.

20 But you can answer.

21 A. I don't suppose that it's -- I don't believe
22 that it's necessary to have geographic representation.

23 I do believe it's important to have a
24 variety of perspectives.

25 Q. (BY MR. ABRAMS) Why?

1 A. Because we're richer. I think you -- I see
2 that when I work with my colleagues now, that people
3 bring legal expertise, they bring financial expertise.
4 You do not want a school board of seven teachers. It
5 just would not work. You need professional
6 experiences and wisdom.

7 **Q. In your view, do you know more about the**
8 **schools that your children attend than other schools,**
9 **despite your efforts to learn more about all the**
10 **schools in the district?**

11 A. I do know more about my children's schools.

12 **Q. And do you think that that as a general**
13 **proposition is true, that every parent on the school**
14 **board knows more about their own children's schools**
15 **than they know about other schools in the district,**
16 **even if they sincerely make efforts to familiarize**
17 **themselves with the conditions in other schools?**

18 A. I don't actually believe you need to know
19 what's going on in a school to be, like, a trustee. I
20 think you need to know what's going on in the
21 community and what people care about and what needs --
22 and you also -- just remember what the job of a
23 trustee is, right? We are entrusted by the community
24 for policy and oversight of the superintendent.

25 I can fire, I can hire, and I can hold the

1 superintendent accountable. I'm not administration,
2 so I'm not the principal of a building and I'm not the
3 PTA of a building.

4 **Q. With respect to formulating policy for the**
5 **school district, do you agree that it is beneficial to**
6 **have on our school board representatives who are**
7 **personally familiar with the conditions existing**
8 **throughout the community?**

9 A. I think it's more important to have people with
10 perspectives that -- that understand a variety of
11 experiences.

12 So I'll take the current board as an
13 example, someone with a legal background, someone with
14 a real estate background, people that are asking
15 questions, because the job is not to establish policy
16 because the seven of us in a room know better than
17 others. It is to listen and to ask tough questions.

18 Sometimes we're better off with what we
19 don't know than what we do know because we ask
20 questions, is my supposition, my belief.

21 **Q. Are you familiar with a website called "Save**
22 **SBISD"?**

23 A. I am.

24 **Q. What is it?**

25 A. I visited the website only a -- a few times.

1 What I remember from those visits, you know, recent,
2 that there was an ongoing blog and kind of a
3 perspective of what is happening in the district and
4 how people should be engaged and have a voice.

5 **Q. Do you know who organized that site?**

6 A. I do not know.

7 **Q. Do you know who leads that group?**

8 A. No.

9 **Q. Do you know who's responsible for the content**
10 **of the website?**

11 A. No.

12 **Q. Do you know who played any role in creating the**
13 **website?**

14 A. No.

15 **Q. Does it appear that some attempt has been made**
16 **to conceal the actual sponsors and contributors to**
17 **that site? I've not found a single person who seems**
18 **to know who's behind it.**

19 A. I don't have any information about who created
20 the site, who runs the site, whether they're doing it
21 intentionally or unintentionally. I don't know.

22 **Q. How about a group known as the PIPEline? Are**
23 **you familiar with such a group?**

24 A. I am familiar with it.

25 **Q. What is it?**

1 A. My recollection was that they formed, you know,
2 back in the summer after COVID began for Parents For
3 in Person Education and that the intent was to get
4 schools reopened and to get kids learning in
5 classrooms, which is exactly what we did, and agreed
6 that kids learn better in person.

7 We also agreed that parents and families
8 needed to be able to make a decision that year to --
9 for what was best for their family and that we would
10 support the education and that choice.

11 **Q. My sense, from looking at quite a few**
12 **e-mails --**

13 A. Uh-huh.

14 **Q. -- that the District has produced of**
15 **communications with your board, is that the views of a**
16 **number of people that align with the PIPEline don't**
17 **seem to correspond to the notion that their views**
18 **match the board's views.**

19 **Do you agree with that?**

20 A. I think that it's very hard to tell in an
21 e-mail whether someone is or is not aligned to a
22 group, right? That's not how the e-mails are signed.

23 But there are definitely people who e-mail
24 us who believe that their views do not match and are
25 not supported by the board.

1 Q. Do you know who organized the PIPELINE?

2 A. I do not.

3 Q. Do you know who is a member of its leadership?

4 A. No. I have -- I would have guesses, right? I
5 would have made up hypotheses that may or may not be
6 correct.

7 Q. Have any of the residents who have communicated
8 with you self-identified as representatives or members
9 of the PIPEline?

10 A. Not to my recollection.

11 Q. Let me hand you what's been marked as
12 Exhibit 19.

13 A. Okay.

14 Q. Are y

11 Q. Are you familiar with the expression, quote,
15 Don't HISD My SBISD?

16 A. I am.

Q. What does it mean to you?

18 A. Very good question.

19 So as noted in this exhibit, it -- that
20 phrase has showed up both as yard signs and as e-mails
21 in our inboxes.

22 My -- my understanding -- my interpretation
23 of that is that HISD is a single-member district
24 system and that they have concerns with HISD,
25 either -- which I'm unclear -- either from a

1 performance or from a historical board behavior
2 perspective, but that has never been clear.

3 **Q. Let me hand you what's been marked as Trustee**
4 **Exhibit 20.**

5 **Do you recognize that as a photograph at**
6 **the top of the members of the Spring Branch board?**

7 A. Yes.

8 Q. And a photograph at the bottom of at least what
9 at the time of the photograph were the members of the
10 Houston Independent School District board?

11 A. Yes, but I can't find a few board members that
12 I know, so that's -- yeah.

13 Q. Do you agree that --

14 A. That's right. They're missing a board member.
15 There's only eight.

16 Q. Do you agree that, as reflected on Exhibit 20,
17 the represent -- the representatives on the SBISD
18 board are all white and the HISD board is multiracial
19 and multiethnic?

20 A. I know for a fact, without this picture, that
21 they have a multiracial -- they don't have a
22 current -- it doesn't seem that they have a
23 multi-gender board.

24 Q. Interesting. I know that there have been
25 several election changes since that photograph was

1 taken, and I believe that may have cured that --

2 A. It may have.

3 Q. -- disparity.

4 Do you believe there's anything undesirable
5 about having racial and ethnic diversity reflected on
6 the HISD board?

7 A. Can you rephrase that question?

8 Q. Do you believe there's anything undesirable
9 about having racial and ethnic diversity as reflected
10 on the HISD board?

11 A. I've never thought about it, but no.

12 Q. As a trustee, have you ever promoted the Don't
13 HISD My SBISD theme?

14 A. No.

15 Q. Why not?

16 A. No, I have not.

17 Q. Why not?

18 A. Because that's not the message of the system,
19 right?

20 I mean, I'm not here to -- what is -- I
21 mean, I'm not here to disparage other systems or other
22 districts or communities or families or children,
23 ever.

24 Spring Branch, I believe, is an incredible
25 place because we are a single community, because we

1 work together for the greater good of every single
2 child every single day. That work is hard, but we're
3 in it together.

4 I mean, we -- I will say, as people know --
5 I mean, Spring Branch is not a place on a map unless
6 you're headed to San Antonio, but Spring Branch ISD
7 is. We are here as Spring Branch because of a school
8 system that holds -- that is the backbone of our
9 community.

10 **Q. Are you aware whether or not in the last
11 election, specifically, the voting patterns differed
12 markedly between the north side voters and the south
13 side voters?**

14 A. Yes.

15 Q. To generalize -- and I'll show you
16 **Exhibit 12 --**

17 A. Okay.

18 Q. -- which is a District-produced summary --

19 A. Uh-huh.

20 Q. -- of the election results of the Earnest and
21 Elizondo campaign.

22 A. Right.

23 Q. If you do the math, generally you will find
24 that if you group the north side election precincts
25 and the south side precincts --

1 A. Uh-huh.

2 Q. -- Mr. Earnest prevailed in roughly 65 percent
3 of the votes south of I-10 and Ms. Elizondo prevailed
4 in roughly 66 percent of the votes north of I-10.

5 I'm asking you to accept that
6 representation.

7 A. Yeah, I was going to say I can't do that math
8 that fast.

9 Q. I'm not asking you to be a math wizard.

10 Do you agree that that sort of voting
11 pattern is inconsistent with your notion of one
12 Spring Branch with a common view about how the board
13 should function?

14 A. Can you ask that question again --

15 Q. Sure, sure.

16 A. -- because I'm not -- I get the idea, right?
17 You're saying Chris Earnest earned 65 percent of the
18 vote from the south side -- predominantly south side
19 middle school precincts and Virginia Elizondo for --
20 received 66 percent of the vote for the predominantly
21 north side.

22 Q. Yes.

23 A. And you're asking is that a contraindication of
24 one Spring Branch.

25 Q. I'm asking whether that's inconsistent with

1 **your notion that there are universally common views on**
2 **the north and south sides of 10 about how the district**
3 **should operate?**

4 A. There -- I do not believe that there are
5 universal views anywhere in our system about how
6 school -- or -- or who the best representative is to
7 be on the board to -- to lead the system forward. I
8 mean, that's voting.

9 **Q. Do you believe with respect to the Don't HISD**
10 **My SBISD slogan, that there are any negative racial or**
11 **ethnic connotations to that expression?**

12 A. There are negative connotations, for sure. The
13 question is whether there is ethnic or racial
14 negative connotations.

15 I did not read it that way, initially.
16 Again, I don't know the intentions of the people, but
17 I -- I mean...

18 **Q. You conditioned your answer by saying,**
19 **initially you didn't read it that way.**

20 A. Oh, okay.

21 **Q. Did you later come to appreciate that others in**
22 **the community read it differently?**

23 A. Yes.

24 **Q. How have others reported to you they**
25 **interpreted the expression Don't HISD My SBISD?**

1 A. I have heard community members recognize this
2 as a racially-motivated statement.

3 **Q. And do you appreciate --**

4 A. And these were people without a sign.

5 **Q. Do you appreciate that that is one logical**
6 **interpretation of that expression, whether or not it**
7 **was the original intent?**

8 A. It's one interpretation.

9 **Q. Do you think it's a reasonable interpretation,**
10 **based upon the complaints you've heard from some**
11 **citizens?**

12 A. Based on citizen complaints, that is a
13 reasonable interpretation.

14 **Q. Again, with reference to this expression, Don't**
15 **HISD My SBISD, as a trustee, do you claim that the**
16 **quality of education in HISD is inferior to that in**
17 **Spring Branch?**

18 A. Absolutely not.

19 **Q. Indeed, a number of their programs are ranked**
20 **much more highly by a variety of ranking systems than**
21 **the Spring Branch programs, correct?**

22 A. Correct.

23 I mean, I'm not looking at rankings. Don't
24 fully buy into children at risk ranking systems, but
25 let's -- we could talk about some of their really

1 powerful programs, easily.

2 Q. I want to spend a minute talking to you about
3 what you know about early voting in Spring Branch
4 trustee elections? Okay?

5 A. Okay.

6 Q. Has it been your observation that Spring Branch
7 trustee elections are often won based on the early
8 voting turnout rather than the election day vote?

9 A. I don't believe so. I mean, I -- I'd truly
10 have to look at data, but my experience was election
11 day was crucial for the decision.

12 Q. If you would --

13 A. In my races I will say it was. Let's look at
14 the numbers.

15 Q. If you would, let's look at Exhibit 12 --

16 A. Uh-huh.

17 Q. -- which is the District's Canvas Report for
18 the 2021 election that was contested.

19 Do you see that there were --

20 A. I do.

21 Q. -- 8802 total votes cast?

22 A. And 5600 early votes.

23 Q. And 5635 votes cast early.

24 That's roughly 64 percent of all the votes
25 cast.

1 A. I agree with that math.

2 Q. And so at least in the last election, the early
3 voting was critical to the outcome.

4 A. Yes.

5 Q. Do you agree?

6 A. I agree.

7 Q. And do you agree with me that the early voting
8 totals that the Candidate Earnest received in the
9 Memorial, Spring Branch, and Spring Forest election
10 precincts were, in and of themselves, sufficient to
11 carry the election?

12 A. Can you repeat that?

13 Q. Do you agree with me --

14 A. Is there one that I can draw on? Oh, it's
15 erasable pen.

16 Okay. So say the number, the ones again --

17 Q. I'm directing your attention to the early
18 voting tally for Memorial, Spring Branch, and Spring
19 Forest.

20 A. Okay.

21 Q. And if you look in the left-hand column, you'll
22 see the vote totals --

23 A. Uh-huh.

24 Q. -- that Mr. Earnest received. 1725 --

25 A. Uh-huh.

1 Q. -- from Memorial, 2369 from Spring Branch, and
2 632 from Spring Forest.

3 Do you see that?

4 A. Yes.

5 Q. I think that's 4600-ish.

6 A. Uh-huh.

7 Q. I think. Doing my math. 46-plus.

8 | And the total vote was 8802.

9 A. Okay.

10 Q. So that's more than half of the votes --

11 A. That is more than half of the votes.

12 Q. -- right?

13 So if one secured a majority of the
14 Memorial, Spring Branch, and Spring Forest precincts,
15 one won the election, right?

16 A. I think you've got a little bit of a margin of
17 error that once they got -- he received -- well, okay.
18 So you're right; if he had received 1725 plus 2369 and
19 632 from those three schools, then he had more than 50
20 percent of the full vote.

21 Q. Okay. Do you agree that in the past, all early
22 voting locations within the district have been located
23 within the election precincts for Spring Branch Middle
24 School, Memorial Middle School, and Spring Forest
25 Middle School and none were located within the

1 **Landrum, Northbrook, Spring Oaks, or Spring Woods**
2 **election precincts or attendance zones?**

3 A. I'm looking at Holy Cross.

4 Q. **Yeah.**

5 A. Yes.

6 Q. **Holy Cross is in Hillshire Village, and it's**
7 **within the Spring Branch Middle School zone?**

8 A. Yes.

9 Q. **Correct?**

10 A. Correct.

11 Q. **In your experience, does the physical location**
12 **of a early voting location contribute to the**
13 **likelihood that somebody will vote if it's easy to get**
14 **there, increases turnout, and if it's hard to get**
15 **there, it inhibits turnout?**

16 A. I think that that's -- I've never really
17 thought of the supposition, but yes, that would make
18 sense.

19 Q. **Yeah.**

20 **For example, the -- what I still call the**
21 **ag building, but the Wayne Schaper Leadership Center**
22 **is located just right behind Spring Branch Middle**
23 **School, correct?**

24 A. That would make it easier for people to vote,
25 correct.

1 Q. And the Don Coleman voting center is located
2 adjacent to Stratford High School, correct?

3 A. Correct.

4 Q. And just a stone's throw from Spring Forest
5 Middle School?

6 A. Correct.

7 Q. You'll agree with me that the physical
8 proximity, for example, of those two voting locations
9 is much closer than the physical proximity between
10 Northbrook, Spring Woods, Spring Oaks, and Landrum to
11 any of the early voting locations?

12 A. Yes.

13 Q. When you ran in your contested elections, did
14 you seek the support and were you endorsed by any
15 community or political groups?

16 A. No on political groups. I cannot think of
17 a community -- community members, but not a community
18 group that endorsed.

19 Q. Let me hand you what was earlier marked as
20 Trustee Exhibit 27. It's a screenshot, so it's a
21 little blurry.

22 A. Uh-huh.

23 Q. From a television program.

24 A. Right.

25 Q. Have you ever seen either the program that the

1 screenshot came from or this photograph?

2 A. I have seen this piece on the news.

3 Q. And you recognize, then, Exhibit 27 is a
4 photograph of Mr. Lezama on the left and a letter that
5 he contends he received at his home in connection with
6 his campaign for the school board, correct?

7 A. Uh-huh.

8 Q. Is that a "yes"?

9 A. Correct.

10 Q. And the letter, which has some portions whited
11 out, talks about somebody white beating his little
12 bitty brown blank, which has been redacted.

13 And this came out of the campaign in which
14 he ran against Ms. Minda Caesar.

15 Are you aware that Mr. Lezama received
16 correspondence of this sort in connection with his
17 attempt to be a school board trustee?

18 A. I learned about it from the news.

19 Q. What's your reaction to the -- the letter that
20 is shown on Exhibit 27?

21 A. I find any such mail horrific.

22 Q. Are you aware of any other instances where
23 minority candidates for the school board have received
24 similar communications that are ethnically- or
25 racially-oriented?

1 A. I am not.

2 I was told by one candidate that she, in
3 her first run, had been targeted, and she felt unsafe
4 from that.

5 Q. **What did you understand the candidate meant**
6 **when she said she had been targeted?**

7 A. The visual, in my memory -- recollection of
8 that conversation was that some -- she thought someone
9 had been in front of her house, watching her, and that
10 it was unsafe and it was based on the fact that she
11 was Hispanic and running for the board. That was her
12 understanding of -- and I found that equally horrific.

13 Q. **In the recent past, there have been three**
14 **minority candidates for the board, correct?**

15 Mr. Lezama, who --

16 A. Yes.

17 Q. -- ran against Ms. Caesar in 2018, correct?

18 A. Mr. Lopez.

19 Q. Mr. Lopez who ran against Carter Breed in 2019?

20 A. Yes.

21 Q. Ms. Elizondo, who earlier ran against Chris
22 Vierra, and then again ran in 2021 against
23 Mr. Earnest, correct?

24 A. Correct.

25 Q. And in each of those races, the successful

1 candidate was Anglo, correct?

2 A. Correct.

3 Q. This year is the 75th anniversary of the
4 Spring Branch Independent School District, correct?

5 A. Correct.

6 Q. Is it consistent with your understanding that
7 in the 75-year history of the district, no -- no
8 minority member or person of color has ever been
9 elected to or appointed to serve on its board of
10 trustees?

11 A. As far as I know.

12 Q. How does that make you feel?

13 A. How does that make me feel?

14 I believe that we need perspectives on our
15 board, and I believe those are often professional and
16 personal experiences. I believe that board members
17 bring their experience and their wisdom to the
18 questions they ask and the things that they explore
19 and urge the system into its greatness.

20 I believe that we should have geographic,
21 racial, gender -- I mean, you make it up from there on
22 out -- perspectives on our board.

23 Q. Have any of the minority candidates that we
24 just mentioned who have run for the school board, in
25 your view, as an experienced school board member, been

1 **qualified?**

2 A. Yes.

3 Can I also state that I believe most people
4 running for the board are qualified in some form or
5 way. Some candidates have had even more experience
6 with an education.

7 Again, you don't want a board of seven
8 teachers, but I think it's an important perspective.

9 **Q. Given that qualified candidates of color have**
10 **run for the school board in the past and have never**
11 **been elected in 75 years, to what do you attribute**
12 **that?**

13 A. I don't know. I don't know.

14 **Q. Do you agree it's a positive or a negative for**
15 **the Spring Branch Independent School District never to**
16 **have had a person of color elected to or appointed to**
17 **its school board?**

18 **MR. HENRY:** Objection, form.

19 A. But there's no way it can be positive that we
20 haven't had someone of color on our board. I go back
21 to perspectives matter and experiences influence the
22 work we do.

23 **Q. (BY MR. ABRAMS) Did you support the plaintiff,**
24 **Virginia Elizondo's, candidacy for the school board?**

25 A. I did.

1 **Q. Why?**

2 A. Because she's qualified.

3 **Q. To what do you attribute the fact that she**
4 **didn't get elected to the school board?**

5 A. I attribute it to a rising groundswell of
6 politically-motivated activism.

7 I will say that -- I remember on election
8 day, someone walked by me convinced that they needed
9 to vote against a communist. I was clear that there
10 were no communists running for the board.

11 **Q. Have you in the entire time you have lived in**
12 **Spring Branch ever seen the same vitriol directed at**
13 **an Anglo candidate?**

14 A. I've never seen the same vitriol directed at
15 any school board candidate.

16 **Q. Do you believe you've understood my questions**
17 **here today, except where you told me you didn't?**

18 A. I think I did.

19 **Q. Are there any answers that you would like to**
20 **now change, correct, or supplement?**

21 A. No.

22 **MR. ABRAMS:** Then I will pass the
23 witness at this time, and I thank you very much for
24 your taking time to visit with me on the record.

25 **THE WITNESS:** Thank you for your time.

3 MR. ABRAMS: Thanks a lot.

4 (Deposition concluded.)

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1 CHANGES AND SIGNATURE

2 **WITNESS NAME:** CHRISTINA GONZALEZ **DATE:** 2/17/2022

3 PAGE LINE CHANGE REASON

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24 _____
25 _____

I, CHRISTINA GONZALEZ, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.

3

4

5

CHRISTINA GONZALEZ

6

7

8

10 Before me, _____, on this day
11 personally appeared CHRISTINA GONZALEZ, known to me
12 (or proved to me under oath or through
13 _____) (description of identity
14 card or other document) to be the person whose name is
15 subscribed to the foregoing instrument and
16 acknowledged to me that they executed the same for the
17 purposes and consideration therein expressed.

18

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25

NOTARY PUBLIC IN AND FOR

THE STATE OF

COMMISSION EXPIRES:

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

REPORTER'S CERTIFICATION
DEPOSITION OF CHRISTINA GONZALEZ
FEBRUARY 17, 2022

I, Annette Peltier, Certified Shorthand Reporter in
and for the State of Texas, hereby certify to the
following:

That the witness, CHRISTINA GONZALEZ, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness;

That the original deposition was delivered to
Mr. Barry Abrams, Custodial Attorney.

That a copy of this certificate was served on all parties shown herein on _____.

I further certify that pursuant to FRCP Rule 30(f)(1) that the signature of the deponent:
____ was requested by the deponent or a part

1 before the completion of the deposition and that
2 signature is to be returned within 30 days from the
3 date of receipt of the transcript. If returned, the
4 attached changes and signature page contains any
5 changes and the reasons therefore.

6 XXX was not requested by the deponent or party
7 before the completion of the deposition.

8 I further certify that I am neither counsel for,
9 related to, nor employed by any of the parties or
10 attorneys in the action in which this testimony was
11 taken. Further, I am not a relative or employee of
12 any attorney of record in this cause, nor am I
13 financially or otherwise interested in the outcome of
14 the action.

15 Certified to by me this 3rd day of March, 2022.

16 
17



18 Annette Peltier, Texas CSR 3253

19 Expiration Date: 10/31/23

20 Firm Registration No. 223

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23 Houston, Texas 77027

24 713.572.2000

25

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